

1 PAUL L. REIN, ESQ. (State Bar No. 43053)
2 CELIA MCGUINNESS, ESQ. (State Bar No. 159420)
3 CATHERINE CABALO, ESQ. (State Bar No. 248198)
4 LAW OFFICES OF PAUL L. REIN
5 200 Lakeside Drive, Suite A
6 Oakland, CA 94612
7 Telephone: (510) 832-5001
8 Facsimile: (510) 832-4787
9 reinlawoffice@aol.com

6 Attorneys for Plaintiff
7 GERARDO HERNANDEZ

8 ** Defendant's counsel listed after the caption*

11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 GERARDO HERNANDEZ,
14 Plaintiff,

15 v.

16 SAN MATEO COUNTY COMMUNITDY
17 COLLEGE DISTRICT (CANADA
18 COLLEGE); DOES 1-10, inclusive,
19 Defendant.

Case No. 3:14-cv-05317 RS

Civil Rights

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE DEADLINE
TO MEDIATE UNDER GENERAL
ORDER 56**

Action Filed: December 4, 2014

20 JOHN C. BEIERS, COUNTY COUNSEL (State Bar No. 144282)
21 KATHRYN E. MEOLA, ESQ. (State Bar No. 172034)
22 KRISTINA M. PASZEK, ESQ. (State Bar No. 226351)
23 Hall of Justice and Records
24 400 County Center, 6th Floor
25 Redwood City, CA 94063
26 Telephone: (650) 363-4250
27 Facsimile: (650) 363-4034
28 E-mail: kmeola@smcgov.org
E-mail: kpaszek@smcgov.org

Attorneys for Defendant
SAN MATEO COUNTY COMMUNITY
COLLEGE DISTRICT

STIPULATION

Plaintiff GERARDO HERNANDEZ (“Plaintiff”) and defendant SAN MATEO COUNTY COMMUNITY COLLEGE DISTRICT (“Defendant”) – Plaintiff and Defendant together the “Parties” -- hereby stipulate and request that the Court extend the deadline for the Parties to mediate under General Order 56. The Parties do so based on the following Good Cause:

1. Plaintiff filed his action on December 4, 2014.
2. The subject property is Canada College, a large college campus located in Redwood City, California.
3. The Parties have been working cooperatively within the parameters of General Order 56 to resolve Plaintiff’s claims, including conducting a joint site inspection on April 21, 2015 and April 22, 2015.
4. Plaintiff issued an injunctive relief demand and disclosed his access consultant’s report to Defendant on June 22, 2015. Based on the report of Plaintiff’s access consultant, Plaintiff alleges many issues related to disabled access at the subject property.
5. Plaintiff filed a Notice of Need for Mediation on July 6, 2015. Docket No. 19.
6. The case was referred to mediation on July 10, 2015, and assigned a mediator on August 26, 2015. Docket No. 20.
7. Since that time, the Parties have continued to negotiate the settlement of injunctive relief.
8. The Parties have scheduled an in-person meet and confer, which will include all counsel, Defendants’ representatives, and the Parties’ access consultants on September 22, 2015.
9. During a pre-mediation teleconference with the assigned General Order 56 mediator, The Honorable James Lambden (Ret.), on September 14, 2015, the mediator and the Parties tentatively agreed to a mediation date of October 29, 2015.

1 10. Presently, the deadline to mediate under General Order 56 is October 5, 2015.

2 To keep costs down in this case and to facilitate efficient resolution of the case through
3 mediation and the General Order 56 process, the Parties therefore stipulate and request that the
4 Court Order the deadline for mediation to take place under General Order 56 be extended to
5 November 20, 2015.

6
7 **IT IS SO STIPULATED.**

8
9 Dated: September 17, 2015

LAW OFFICES OF PAUL L. REIN

10
11 /Catherine Cabalo
12 By: CATHERINE CABALO, ESQ.
13 Attorneys for Plaintiff
GERARDO HERNANDEZ

14 Dated: September 16, 2015

SAN MATEO COUNTY COUNSEL


15
16 /s/ Kristina Paszek
17 By: KRISTINA PASZEK, ESQ.
18 Attorneys for Defendant
SAN MATEO COUNTY COMMUNITY
19 COLLEGE DISTRICT

20 **ORDER**

21 For GOOD CAUSE SHOWN and for the reasons set forth above, the deadline for the
22 parties to complete mediation through General Order 56 shall be November 20, 2015.

23 **IT IS SO ORDERED.**

24
25 Dated: 9/18, 2015

26 
27 Honorable Richard Seeborg
28 United States District Court Judge

FILER'S ATTESTATION

Pursuant to Local Rule 5-1, I hereby attest that on September 16, 2015, I, Catherine Cabalo, attorney with The Law Office of Paul L. Rein, received the concurrence of Kristina Paszek, counsel for Defendant, in the filing of this document.

/s/ Catherine Cabalo
Catherine Cabalo